## LUKAS, NACE, GUTIERREZ & SACHS

CHARTERED

1111 NINETEENTH STREET, N.W.
SUITE 1200

WASHINGTON, D.C. 20036
(202) 857-3500

RUSSELL D. LUKAS
DAVID L. NACE
THOMAS GUTIERREZ
ELIZABETH R. SACHS
GEORGE L. LYON, JR.
JOEL R. KASWELL
PAMELA L. GIST
DAVID A. LAFURIA
MARILYN SUCHECKI MENSE
B. LYNN F. RATNAVALE
TODD SLAMOWITZ
DAVID M. BRIGLIA
STEVEN M. CHERNOFF
\* NOT ADMITTED IN D.C.

August 1, 2003

CONSULTING ENGINEERS
ALI KUZEHKANANI
LEROY A. ADAM
LEILA REZANAVAZ

OF COUNSEL
JOHN J. MCAVOY
J.K. HAGE III<sup>+</sup>
LEONARD S. KOLSKY<sup>+</sup>
HON, GERALD S. MCGOWAN

TELECOPIER
(202) 857-5747
------http://www.fcclaw.com

WRITER'S DIRECT DIAL

(202) 828-8434 tslamowitz@fcclaw.com

### Via Hand Delivery

Marlene H. Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, D.C. 20554

Re: Guam Cellular and Paging, Inc.

TRS#

E911 Interim Report

Dear Ms. Dortch:

Guam Cellular and Paging, Inc. ("GuamCell") hereby files its E911 Interim Report regarding its wireless Enhanced 911 (E911) deployment and implementation status.

GuamCell recognizes the public safety importance of Phase II E911 service. It provides wireless service in the islands of Guam and Saipan; small islands located in the western Pacific Ocean with a combined population of approximately 200,000. As set forth below, GuamCell provides its responses to the information requested by the Wireless Telecommunication Bureau in its Public Notice released June 30, 2003 (Public Notice, DA 03-2113, Wireless Telecommunications Bureau Provides Further Guidance on Interim Report Filings by Small Sized Carriers).

1. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid).

At this time, GuamCell has not received any valid Phase I or Phase II PSAP requests.

2. The carrier's specific technology choice (*i.e.*, network-based or handset-based solution, as well as the type of technology used).

GuamCell has chosen to deploy a network-based solution.

### 3. Status on ordering and/or installing network equipment.

GuamCell has had discussions with vendors regarding a network-based solution. However, it has not upgraded its network since neither Guam or Saipan are Phase I or Phase II capable. Nonetheless, GuamCell believes the costs to become Phase II compliant is a substantial investment for a small carrier such as GuamCell (GuamCell has received a quote of \$4,000,000 for the necessary hardware and software upgrades). Hence, GuamCell will consider seeking relief from the Phase II requirements if and when it receives a valid Phase II PSAP request.

4. If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets.

Not Applicable.

5. The estimated date on which Phase II service will first be available in the carrier's network.

Because it has not received a valid Phase II PSAP request (nor has been provided any time frame as to when either Guam or Saipan will initiate either Phase I or Phase II service), GuamCell is unable to provide a reasonable date when Phase II service will be available in its service area.

6. Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005.

Not Applicable.

In the event you have any questions with respect to this matter, please contact the undersigned.

Sincerely,

David A. LaFuria

Todd Slamowitz

# <u>AFFIDAVIT</u>

County o	) SS:
State of	Territory of Guam )
I,	Jay R. Shedd, having been first duly sworn, depose and state as follows:
1.	I am Senior Vice President/General Manager for Guam Cellular & Paging.
2.	I am familiar with the facts contained in the foregoing Interim Report of the status of Enhanced 911 Phase II compliance, and I verify that those facts are true and correct to the best of my knowledge and belief, except that I do not and need not attest to those facts which are subject to official notice by the Commission.
I	declare under penalty of perjury that the foregoing is true and correct.
	Jay/R Shedd Senior Vice President/General Manager Guam Cellular & Paging
_ /\((\)	And sworn to before me day of, 2003.  Notary Public

My commission expires:

PARIS J.M. BLAS
NOTARY PUBLIC
In and for Guam, U.S.A.
My Commission Expires: May 16, 2005
718 North Marine Drive Ste. 204
Upper Turnon, Guam 98911

#### **CERTIFICATE OF SERVICE**

I, Steven McCord, an employee in the law offices of Lukas, Nace, Gutierrez & Sachs, Chartered, do hereby certify that I have on this 1<sup>st</sup> day of August, 2003, delivered a copy of the foregoing Enhanced 911 Tier III Interim Report to the following:

John Muleta, Chief\*
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C252
Washington, D.C. 20554

David Solomon, Chief\* Enforcement Bureau Federal Communications Commission 445 12th Street, S.W., Room 7-C723 Washington, D.C. 20554

Blaise Scinto, Acting Chief\*
Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C133
Washington, D.C. 20554

Jennifer Tomchin, Legal Advisor\*
Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-C400
Washington, D.C. 20554

Patrick Forster\*
Policy Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W., Room 3-A104
Washington, D.C. 20554

Robert M. Gurss
Director of Legal and Government Affairs
APCO International
1725 DeSales Street, NW, Suite 808
Washington, D.C. 20036
Counsel for APCO

James R. Hobson Miller & Van Eaton, P.L.L.C. 1155 Connecticut Ave. N.W., Suite 1000 Washington, D.C. 20036 Counsel for NENA and NASNA

John Ramsey, Executive Director APCO International, Inc. World Headquarters 351 N. Williamson Blvd. Daytona Beach, FL 32114-1112

Jim Goerke, Interim Executive Director NENA 422 Beecher Rd. Columbus, OH 43230

Evelyn Bailey, Executive Director, NASNA Vermont Enhanced 9-1-1 Board 94 State Street Drawer 20 Montpelier, VT 05620-6501

Steven McCord

<sup>\*</sup>via hand-delivery